



George Hasselback <george.hasselback@gmail.com>

## Fejeran v. Freedom Air.

2 messages

David P. Ledger <dledger@carlsmith.com>

Tue, Oct 17, 2006 at 9:24 AM

To: George Hasselback <george.hasselback@gmail.com>

Cc: "June M.C. Borja" <JBorja@carlsmith.com>

Dear George: Here, again, is the proposed Amended Case Management Order, last sent to you on October 4, 2006. May I suggest that the time has come to submit the order. Please let me have your comments, if any, or your signature on the document.

Also, I would like to follow up on the discussion we had concerning expert witnesses. First, though Mr. Perez's report was supposed to be available to us by the end of September 2006, we do not have it. Please follow up with Mr. Perez and obtain his report for us, so as to permit us to move ahead with our rebuttal work. Second, what is the status of arrangements to have the life-care evaluation and defendant's IME conducted at the same time in Honolulu, Hawaii, where defendant's medical expert is located ? We need to come to some sort of arrangements on this and get it set up. We do not anticipate any scheduling difficulties with our medical expert, yet we do need some advance dates to work with.

I look forward to your soonest possible response.

Thank you,

David Ledger  
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Amended Case Management Scheduling Order (Freedom Air-Fejeran).doc  
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George Hasselback <george.hasselback@gmail.com>

Tue, Oct 24, 2006 at 10:58 AM

To: "David P. Ledger" <dledger@carlsmith.com>

David,

Please excuse my lack of response. I have just finished the first half of a bench trial that went much less smoothly than anticipated. When you have some time, I will have to fill you in. There are quite a

*Ex-1*

few great stories coming out of this one.

In any event, I would suggest one more change to your proposed schedule. Right now the discovery cutoff date and the motion cutoff date are on the same day. I would suggest that we put the discovery cutoff on May 1, 2007 and make the July 2, 2007 date the date upon which dispositive motions are to be heard before the Court. That way, we can have responses to our respective discovery requests (I doubt there will be any that are that tardy, but you never know) and still have time to digest them and draft any motions that we would need. What do you think?

Also, I have contacted Mr. Perez regarding his report and will let you know as soon as I hear something.

Finally, I have a meeting with my client on Friday where we will be discussing some issues with expert witnesses. I will be able to let you know then what we plan on doing with regard to any interviews with his life care planner. I will give you a call Friday afternoon or Monday morning and let you know what we plan on doing.

Thanks again for all of your patience David, and let me know what you think of the scheduling changes.

George.

[Quoted text hidden]

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Thank You